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19 **UNITED STATES DISTRICT COURT**

20 **NORTHERN DISTRICT OF CALIFORNIA**

21 UNITED STATES OF AMERICA

22 v.

23 DANIEL CHAVEZ, and
24 VICTOR SKATES,

25 Defendants.

26) CASE NO. CR 15-0285 -JD
27)
28) **STIPULATION AND [PROPOSED] ORDER**
29) **SETTING STATUS CONFERENCE**
30)
31) PROPOSED DATE: JUNE 12, 2023
32)
33) PROPOSED TIME: 10:30 A.M.
34)

Plaintiff United States of America and defendants Daniel Chavez and Victor Skates, by and through their respective counsel of record, hereby stipulate and request that this Court schedule a status conference in this matter on June 12, 2023 at 10:30 a.m., for the following reasons:

- 1) On April 26, 2023, this matter was randomly reassigned from the docket of Judge Breyer to the docket of this Court.
- 2) There is not, presently, a trial date scheduled in this matter, but the parties are prepared for the Court to set a trial date. The defendants recently filed in advance of the April 26, 2023 status conference before Judge Breyer a “Joint Defense Statement on Trial Scheduling” (Doc. No. 996), which proposed that the estimated three to four month trial be set to commence on September 2, 2024.
- 3) Counsel for Mr. Chavez and Mr. Skates are presently working on a proposed pretrial scheduling order which they will provide to counsel for the government prior to June 12, 2023. Once a trial date is set by the Court, counsel will meet and confer concerning pre-trial scheduling issues. No later than 30 days after the June 12, 2023, the parties will file with this Court either a jointly proposed scheduling order or the parties’ alternative proposals.

IT IS SO STIPULATED.

DATED: May 4, 2023

Respectfully submitted,

ISMAIL J. RAMSEY
United States Attorney

/s/ Stephen Meyer
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5 Attorneys for DANIEL CHAVEZ

6 **~~[PROPOSED] ORDER~~**

7 For the reasons stated in the parties' stipulation, and for good cause shown, the Court
8 hereby schedules a status conference in this matter for 10:30 a.m. on Monday June 12, 2023.
9 Mr. Chavez and Mr. Skates, who are both in the custody of the United States Marshals' Service,
10 shall be present.

11 PURSUANT TO STIPULATION, IT IS SO ORDERED.

12 Dated: May 10, 2023

13 
14 HONORABLE JAMES DONATO
15 United States District Judge